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Attorneys for Defendant
LEFRAK ORGANIZATION, INC.

21 MC 102 (AKH)

IN RE: WORLD TRADE CENTER LOWER
MANHATTAN DISASTER SITE LITIGATION

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SANDRA BAGUERO,

Case No.:
07-CV-5275 (AKH)

Plaintiff,

-against-

BATTERY PARK CITY AUTHORITY, BFP ONE
LIBERTY PLAZA CO., LLC, BLACKMON-
MOORING-STEAMATIC CATASTOPHE, INC.
D/B/A BMS CAT, BROOKFIELD FINANCIAL
PROPERTIES, INC., EMPIRE STATE PROPERTIES,
INC., GENERAL RE SERVICES CORP., HILLMAN
ENVIRONMENTAL GROUP, LLC., HUDSON
TOWERS HOUSING CO., INC., LEFRAK
ORGANIZATION, INC., LIBERTY HOUSE
CONDOMINIUM, LIBERTY TERRACE
CONDOMINIUM, MILFORD MANAGEMENT
CORP., NATIONAL ASSOCIATION OF
SECURITIES DEALERS, INC., NEW LIBERTY
PLAZA LP, NEW YORK CITY ECONOMIC
DEVELOPMENT CORPORATION, NEW YORK
CITY INDUSTRIAL DEVELOPMENT AGENCY,
NEW YORK CITY INDUSTRIAL DEVELOPMENT
CORPORATION, ONE LIBERTY PLAZA,
RICHARD WINNER, THE BOARD OF MANAGERS
OF THE ONE LIBERTY PLAZA CONDOMINIUM
(CONDO #1178), THE ONE LIBERTY PLAZA
CONDOMINIUM (CONDO #1178), VERIZON
COMMUNICATIONS, INC., VERIZON NEW YORK,
INC, WFP ONE LIBERTY PLAZA CO., L.P., WFP

**NOTICE OF ADOPTION
OF ANSWER TO MASTER
COMPLAINT OF LEFRAK
ORGANIZATION, INC.**

ONE LIBERTY PLAZA CO. GP, CORP., and
WORLD FINANCIAL PROPERTIES, L.P.,

Defendants.

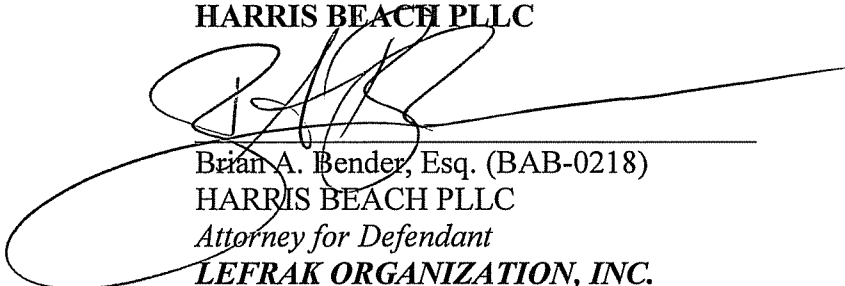
PLEASE TAKE NOTICE THAT defendant, LEFRAK ORGANIZATION, INC., as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopts its Verified Master Answer dated July 30, 2007, which was filed in the matter of *In Re: World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). LEFRAK ORGANIZATION, INC. has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (§ J(2)).

WHEREFORE, LEFRAK ORGANIZATION, INC. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York
September 10, 2007

Yours etc.,

HARRIS BEACH PLLC



Brian A. Bender, Esq. (BAB-0218)

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